

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

:

KATIE MILLIO, IRENE JOHNSON)	
JANINE HELLER and TOMAYITA)	
STEVENSON,)	DOCKET NO. 04-cv-30130
)	
Plaintiffs,)	
)	
v.)	
)	
ULTRASOUND DIAGNOSTIC SCHOOL)	
WHITMAN EDUCATION GROUP,)	
CAREER EDUCATION CORP.,)	
and LOUIS GIANNELLI,)	
)	
Defendants.)	
)	

AFFIDAVIT OF JOEL FELDMAN IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO CORPORATE DEFENDANTS' MOTION TO
COMPEL PLAINTIFFS TO PRODUCE FEE AGREEMENTS

1. I am one of the counsel for the plaintiffs in this case.
2. The plaintiffs have representation agreements with my law firm which include the amount of the fee to be paid to their counsel in this case.
3. The representation agreement between the counsel and the plaintiffs includes some provisions, among other confidential communications, which describe the manner in which counsel will attempt to negotiate any potential settlement of the case, and which therefore reveal the negotiating strategy of the plaintiffs.
4. The agreement addresses the scope of the representation of the client, including which specific legal claims their counsel will pursue.
5. The agreement contains another provision which addresses counsel's review of any decision in this case by a court or administrative body, and the actions to be taken by counsel thereafter,

further disclosing the litigation strategy of the plaintiffs.

6. The agreement also describes the circumstances upon which the representation may terminate, a confidential communication between the plaintiffs and their counsel.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS DAY

DATE: 12/05/05

/s/Joel Feldman
JOEL FELDMAN